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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS SUBMISSION IN
RESPONSE TO DEFENDANTS' BRIEF ON
THE PENULTIMATE JURY
INSTRUCTIONS (DKT. 2549)**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal information in its February 6, 2018 Submission in Response to Defendants’ Brief on the
8 Penultimate Jury Instructions (the “Administrative Motion”). The Administrative Motion seeks an
9 order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Submission	Highlighted in green	Waymo
Exhibit 1 to Waymo’s Submission	Entire document	Waymo

13 3. Waymo’s Submission and Exhibit 1 contain or refer to trade secret information, which
14 Waymo seeks to seal. Portions of Waymo’s Submission and Exhibit 1 contain, reference, and/or
15 describe Waymo’s asserted trade secret. Specifically, the highlighted portions describe certain
16 technical specifications of Waymo’s trade secrets. I understand that these trade secrets are maintained
17 as secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31).
18 The public disclosure of this information would give Waymo’s competitors access to in-depth
19 descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle system. If such
20 information were made public, I understand that Waymo’s competitive standing would be
21 significantly harmed. Waymo’s request to seal is narrowly tailored to only the confidential
22 information.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing is
24 true and correct, and that this declaration was executed in San Francisco, California, on February 6,
25 2018.

26 By /s/ Lindsay Cooper
27 Lindsay Cooper
28 Attorneys for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven